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February 12, 2020

BY ECF ONLY

The Honorable Laura Taylor Swain
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

MEMO ENDORSED

Re: *United States v. Mircea Constantinescu*, 19 Cr. 651 (LTS)

Dear Judge Swain:

After further review our office is requesting that we be discharged as counsel for Mircea Constantinescu and he be assigned pro-bono counsel. The conflict we referred to in our January 20, 2020 letter is substantially more serious than we initially thought.

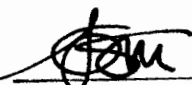
I believe that our contacts with Mr. Florian will severely prejudice either Mr. Constantinescu or Mr. Florian if we continue as Mr. Constantinescu's counsel..

In light of the foregoing information,
 the February 25, 2020, Curcio
 hearing is cancelled and a
 change of counsel hearing will
 be conducted on February 19, 2020,
 at 10:00 AM. The on-duty CJA
 counsel will be requested to attend.
 Mr Constantinescu will be required to
 complete a financial affidavit on
 the attached form if he is requesting
 appointment of counsel.
 Mr Bains must also attend.

Respectfully submitted,
 Tejinder Bains
 Attorney for Mircea Constantinescu

SO ORDERED:

1

 2/13/20
 HON. LAURA TAYLOR SWAIN
 UNITED STATES DISTRICT JUDGE

SDNY
CJA 23
(Rev. 1/12)**FINANCIAL AFFIDAVIT**

IN SUPPORT OF REQUEST FOR ATTORNEY, EXPERT, OR OTHER SERVICES WITHOUT PAYMENT OF FEE

IN THE UNITED STATES ☐ DISTRICT COURT ☐ COURT OF APPEALS ☐ OTHER (Specify below)
IN THE CASE OF

FOR

v.

AT

LOCATION NUMBER

PERSON REPRESENTED (Show your full name)

- 1 ☐ Defendant - Adult
 2 ☐ Defendant - Juvenile
 3 ☐ Appellant
 4 ☐ Probation Violator
 5 ☐ Supervised Release Violator
 5 ☐ Habeas Petitioner
 7 ☐ 2255 Petitioner
 8 ☐ Material Witness
 9 ☐ Other (Specify) _____

DOCKET NUMBERS

Magistrate Judge

District Court

Court of Appeals

CHARGE/OFFENSE (describe if applicable & check box *)

- ☐ Felony
☐ Misdemeanor

ANSWERS TO QUESTIONS REGARDING ABILITY TO PAY

INCOME & ASSETS	EMPLOYMENT	Are you now employed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Self-Employed	
		Name and address of employer: _____	
		IF YES, how much do you earn per month? \$ _____	IF NO, give month and year of last employment? _____ How much did you earn per month? \$ _____
		If married, is your spouse employed? <input type="checkbox"/> Yes <input type="checkbox"/> No	
		IF YES, how much does your spouse earn per month? \$ _____	If you are a minor under age 21, what is the approximate monthly income of your parent(s) or guardian(s)? \$ _____
	OTHER INCOME	Have you received within the past 12 months any income from a business, profession or other form of self-employment, or in the form of rent payments, interest, dividends, retirement or annuity payments, or other sources? <input type="checkbox"/> Yes <input type="checkbox"/> No	
		RECEIVED	SOURCES
		IF YES, give the amount received and identify the sources \$ _____	\$ _____
	CASH	Do you have any cash on hand or money in savings or checking accounts? <input type="checkbox"/> Yes <input type="checkbox"/> No IF YES, total amount? \$ _____	
	PROPERTY	Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
		VALUE	DESCRIPTION
		IF YES, give value and description for each \$ _____	_____
		\$ _____	_____
		\$ _____	_____
		\$ _____	_____

OBLIGATIONS & DEBTS	DEPENDENTS	MARITAL STATUS Single _____ Married _____ Widowed _____ Separated or Divorced _____	Total No. of Dependents _____	List persons you actually support and your relationship to them _____
	DEBTS & MONTHLY BILLS (Rent, utilities, loans, charge accounts, etc.)	DESCRIPTION	TOTAL DEBT	MONTHLY PAYMENT
		\$ _____	\$ _____	\$ _____
		\$ _____	\$ _____	\$ _____
		\$ _____	\$ _____	\$ _____
		\$ _____	\$ _____	\$ _____

I certify under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF DEFENDANT
(OR PERSON REPRESENTED)

Date



APPROVED



DENIED

FD/CJA/RET. ATTORNEY

(PRINT)

ASSISTANT UNITED STATES ATTORNEY (PRINT)

SIGNATURE OF JUDICIAL OFFICER

DATE